

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

<b>In re:</b>	§	
	§	
<b>WINLAND OCEAN SHIPPING</b>	§	<b>Case No. 15-60007</b>
<b>CORPORATION, <i>et al.</i>,<sup>1</sup></b>	§	<b>(Jointly Administered)</b>
	§	
<b>Debtors.</b>	§	<b>Chapter 11</b>

**NOTICE AND REQUEST FOR STATUS CONFERENCE**

COMES NOW, Okin & Adams LLP (“Okin Adams”), counsel for the Debtors and files this *Notice and Request for Status Conference* (the “Notice”), and in support thereof would respectfully show as follows:

**I. BACKGROUND**

1. On February 12, 2015 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), commencing the Debtors above-styled cases (the “Cases”).

2. Since the Petition Date, the Debtors continue to operate and manage their businesses as debtors in possession pursuant to Bankruptcy Code §§ 1107(a) and 1108.

3. On March 24, 2015, the Court entered an order Authorizing the Employment and Retention of Okin & Adams LLP and Bankruptcy Counsel to the Debtors [Doc. #46].

4. On March 25, 2015, China Merchants Bank Co., Ltd. (“CMB”) filed its Motion of China Merchants Bank Co. Ltd. Pursuant to 11 U.S.C. § 362(d) for Entry of Order Granting Relief From Automatic Stay [Doc. #51] the Lift Stay Motion.

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<sup>1</sup> The Debtors in these chapter 11 cases are: (1) Winland Ocean Shipping Corporation (“Winland”); (2) SkyAce Group Limited (BVI) (“SkyAce”); (3) Plentimillion Group Limited (BVI) (“Plentimillion”); (4) Fon Tai Shipping Co. Ltd. (HK) (“Fon Tai”); (5) Winland Dalian Shipping S.A. (Panama) (“Winland Dalian”); and (6) Won Lee Shipping Co. Ltd. (HK) (“Won Lee”).

5. On April 7, 2015, the United States Trustee for the Southern District of Texas filed a Notice of Appointment of Committee of Unsecured Creditors (the “Committee”) in this case [Doc. #71].

6. On April 30, 2015, the Court entered an order Authorizing the Employment and Retention of The Claro Group, LLC as Financial Advisor and Consultant and Robert Ogle as Chief Restructuring Officer of the Debtors [Doc. #99].

7. A hearing on the Lift Stay Motion was conducted on May 11, 2015 and May 26-27, 2015. Following the hearing, on June 5, 2015, the Court entered an Order Granting China Merchants Bank Co. Ltd.’s Motion Pursuant to 11 U.S.C. § 362(d) for Relief From Automatic Stay [Doc. #131].

## **II. NOTICE & REQUEST FOR STATUS CONFERENCE**

8. Debtors’ counsel files this notice to bring the following matters to the Court’s attention:

i. On June 4, 2015, the Debtors were expected to receive approximately \$90,416.10 in charter revenue. Such funds have not been deposited into the Debtors’ DIP bank account and management is not responding to inquiries regarding the payment.

ii. On June 5, 2015, Ms. Xue Ying resigned as Director of Winland Ocean Shipping Corp.

iii. On June 6, 2015, Mr. Li Honglin resigned as Director and Chief Executive Officer of Winland Ocean Shipping Corp. Mr. Zhou Shiwen was appointed as CEO.

iv. On June 8, 2015, Mr. Shiwen purported to terminate Mr. Ogle as Chief Restructuring Officer. (A copy of the dismissal letter dated June 8, 2015 is attached hereto as **Exhibit A.**)

9. In light of the above occurrences, counsel for the Debtors respectfully requests that the Court schedule a status conference to address any unresolved issues related to these chapter 11 cases.

**DATED:** June 8, 2015.

**OKIN & ADAMS LLP**

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**ATTORNEYS FOR THE DEBTORS**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Notice was served via the Court's ECF system on the 8<sup>th</sup> day of June, 2015.

/s/ David L. Curry, Jr.  
David L. Curry, Jr.